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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VIG DESERT OAKS, LLC, a Nevada limited liability company, individually and as assignee of La Falen Corporation and Vail Commercial Group, LLC,

Plaintiff,

V.

AMTRUST INSURANCE COMPANY, a Delaware corporation; and AMTRUST INSURANCE COMPANY OF KANSAS, INC., a Kansas corporation,

Defendants.

CASE NO. 2:24-CV-00034-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
FILE A REPLY IN SUPPORT OF ITS
MOTION FOR DISCOVERY RULING
UNDER RULE 30(C)(2), TO
PREVENT COACHING
OBJECTIONS AND INSTRUCTIONS
NOT TO ANSWER**

Plaintiff VIG Desert Oaks, LLC (“Plaintiff”) and Defendants AmTrust Insurance Company and AmTrust Insurance Company of Kansas (collectively, “Defendants”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate to extend the deadline for Plaintiff to file a Reply in support of its Motion for Discovery Ruling Under Rule 30(C)(2), to Prevent Coaching Objections and Instructions Not to Answer (the “Deposition Motion”), from November 8, 2024, through and including November 15, 2024.

The reason for the extension is two-fold. First, the Parties are attempting a second mediation on November 7, 2024, and are hopeful to resolve this matter without further court intervention, thereby rendering the Deposition Motion moot.

Second, Plaintiff's counsel has a large seven-day arbitration hearing beginning November 11, 2024, in Houston, Texas, as well as two scheduled depositions this week in

1 another case, making it difficult to devote the time necessary to timely file a reply to the
2 Deposition Motion.

3 Defendants do not oppose the requested extension.

4 Therefore, Plaintiff requests a one-week extension, through and including November
5 15, 2024, in which to file a Reply to the Deposition Motion.

6 RESPECTFULLY SUBMITTED this 6th day of November, 2024.

7 **POLI, MOON & ZANE, PLLC**

8 By: /s/ Michael N. Poli
9 Michael N. Poli
10 Attorney for Plaintiff

11 **LEWIS BRISBOIS BISGAARD & SMITH,
12 LLP**

13 By: /s/ Roger S. Raphael (w/permission)
14 Jeffrey D. Olster
15 Julian Pardini
16 Roger S. Raphael
17 Attorney for Defendants

18 **IT IS SO ORDERED:**

19 
United States Magistrate Judge

20 DATED: November 6, 2024